



Alaska Department of Education & Early Development

Guidance on Determining Economically Disadvantaged Status for Title I and School Accountability August 2016

Economically disadvantaged status

Students that are eligible for free or reduced-price school meals under the department's Alaska Income Eligibility Guidelines for Free and Reduced Meals program, adopted by reference in 4 AAC 06.899(5) are identified as economically disadvantaged (or low-income). These students must be identified in all OASIS data collections.

Purposes

Schools and districts must determine which students are considered economically disadvantaged for several purposes:

- Determining students who are members of the economically disadvantaged subgroup for school and district accountability as required by Alaska regulations 4 AAC 06.830 and 06.899(5).
- Determining which students are eligible for free or reduced price lunches, if the school offers a school lunch program.
- Determining a school's percentage of economically disadvantaged (or "low income") students for identifying schools eligible for Title I, Part A funding and services.
- Determining a school's eligibility for funding under the federal E-Rate program that supports school internet access.

Sources of income data

Family income data is used for determining eligibility for all of the above purposes. This data comes from one or more sources:

1. **Household applications** are completed by families to verify their income level to determine if their students qualify for free lunches or reduced price lunches in schools that offer school lunch programs (frequency depends on whether a school is a Provision 3 or CEP school).
2. **Direct certification** lists provided monthly by Health and Social Services that identify eligible students based on participation in programs such as the Temporary Assistance for Needy Families (TANF), SNAP (Food Stamps), or Foster Care.
3. **Categorically eligible** students that are identified as migrant, runaway, and homeless.
4. **Income declaration form** collected during annual school entry or enrollment for students not already determined as eligible through one of the above methods. Used in schools without school lunch programs (including correspondence schools) and in "provision" schools during years that household applications are not collected.

Frequently Asked Questions

1. What is a “Provision” School?

Schools with high poverty rates that operate school lunch programs may qualify for one of the provision options.

- **Provision 3 schools** use income data from direct certification and household applications for a given year (called the base year) to determine the reimbursement percentage for school lunches for up to 5 years. No household applications are collected in years that are not base years.
- **Community Eligibility Provision (CEP) schools** never collect household applications. School eligibility is determined only by those children categorically eligible (through direct certification or specific category of eligibility) for free meals. The school then receives an enhanced reimbursement rate by taking the rate of children categorically eligible times a multiplier provided by USDA. For school year 2016-2017 that multiplier is 1.6.

2. What is an Income Declaration Form?

All public schools that do not offer lunch programs or that are not collecting household applications must use an Income Declaration form annually to determine which students are economically disadvantaged that have not already been identified through direct certification or categorical eligibility. The form collects general family income information. It is not an in-depth household application for school lunch purposes, but meets the requirements to determine economically disadvantaged status for Title I poverty rates, school accountability, and E-Rate. A sample Income Declaration form and instructions are posted on the EED website at <http://education.alaska.gov/ESEA/TitleI-A/>. This form will be updated with the new income data after July 1 of each year, so be sure to use the current data for the applicable school year in which you are collecting the information. (Note: Household application forms for school meals may *not* be used for survey or other income collection purposes.)

3. How can we encourage families to turn in an Income Declaration form if a school does not offer a lunch program or if the school is under Provision 3 or the Community Eligibility Provision?

The form is worded to encourage families to complete it because it brings benefits to the school such as E-Rate and Title I-A funding. Correspondence or charter schools that have an application process should include the information as part of the application process. Other schools should include the information in the entry/enrollment packet for all students who are not already qualified through direct certification or categorical eligibility.

4. How is a household application for school lunch different from an Income Declaration form?

A household application for free or reduced price lunches is a very detailed application that includes information about the family income. An Income Declaration form for Title I-A or E-Rate purposes is a simple form that allows the family to check the income range and number of people in the family and to list the children enrolled in schools in the district. The district then uses the income level chart to determine which families meet the criteria to be considered economically disadvantaged.

5. Are migrant students considered economically disadvantaged?

Migrant students are categorically eligible for free lunch. *Only the migrant eligible students in the family qualify for free lunch; siblings that are not migrant eligible do not qualify.* Migrant students are eligible for free lunch and thus may be automatically considered as economically disadvantaged students for each school year in which they are migrant eligible students. For questions about identification of migrant students, contact EED's Migrant Education Program Manager, Sarah Emmal, at 465-3826 or sarah.emmal@alaska.gov.

6. Are homeless students considered economically disadvantaged?

Homeless students are considered categorically eligible for free lunch and thus may be automatically considered as economically disadvantaged students for the school year in which they are originally identified as homeless. For questions about identification of homeless students, contact EED's Homeless Education Program Manager, Scott Fiscus, at 465-8718 or scott.fiscus@alaska.gov.

7. Which district staff may have access to data on a child's economically disadvantaged eligibility status?

The actual household application data for a school lunch program is confidential. However, a student's eligibility status as economically disadvantaged is required for federal education programs including Title I; therefore the student eligibility status as economically disadvantaged must be available to applicable district staff for the purposes of those programs. (See "Part 7, Confidentiality/Disclosure of Eligibility Information" on page 69 of the *Eligibility Manuals for School Meals* posted on the EED website at <http://education.alaska.gov/tls/cnp/nslp.html>.)

8. Which district staff need this information?

District staff that may need this information include school lunch personnel, Title I-A coordinators, assessment and accountability staff, business managers, and superintendents. These staff should be familiar with these requirements.

9. Who should I contact if I have questions about school lunch programs and eligibility for free or reduced lunches?

Contact the EED National School Lunch Program Coordinator Elizabeth Seitz at 465-8709 (elizabeth.seitz@alaska.gov) or Jo Dawson, Child Nutrition Program Administrator at 465-8708 (jo.dawson@alaska.gov).

10. Who should I contact if I have questions about criteria for economically disadvantaged status for Title I programs, for accountability for the economically disadvantaged subgroup, or for school poverty data for Title I allocations?

Contact the EED Title I-A Program Manager for your district or contact the ESEA Administrator Elizabeth Davis at 465-8431 or elizabeth.davis@alaska.gov.